

EXHIBIT 19

In the Matter Of:
Fair Fight vs Raffensperger

Chris Harvey - Confidential

December 05, 2019



3200 COBB GALLERIA PARKWAY
SUITE 265
ATLANTA, GA 30339

1 A. Well, I, the way I read it, it says
2 they're accountable for investigating election
3 fraud, and they enforce --

4 Q. I see.

5 A. -- state election laws.

6 Q. Okay.

7 A. And I --

8 Q. And --

9 A. Go ahead.

10 Q. And the "enforcing state election laws"
11 refers to all the State's election laws, doesn't
12 it?

13 A. I think all the state election laws, of
14 course, have to be followed. In terms of enforcing
15 them, there are situations where the Secretary of
16 State's office doesn't have a role in the
17 enforcement.

18 We may provide guidance or illumination
19 about what the law is if a county were to call us,
20 but we don't necessarily enforce the law.

21 Q. What situations are those where you think
22 that the Secretary of State's office doesn't have a
23 role in the enforcement of the election laws?

24 A. Well, for example, if a candidate were to
25 call me, which happens, after an election, and it's

1 generally not the winning candidate, but they would
2 call me and they say, you know, I think I got a raw
3 deal, I think, you know, this person -- they had a
4 sign for this person, you know, they shouldn't have
5 been allowed to work at the polls or whatever
6 the -- and I would tell them, look, the law allows
7 you to contest the election, here's how you do it,
8 you go to 21-2-524, and there's a procedure if you
9 want to contest the election, I can't do anything
10 about the fact that you think you got a raw deal in
11 the election.

12 If somebody calls and says they're upset
13 because they weren't hired as a poll worker and
14 they want to take it up with the, you know, the
15 Secretary of State for -- because the county
16 election director in X county didn't hire them as a
17 poll worker or fired them as a poll worker, I tell
18 them the same thing, look, we don't have any
19 authority to determine employment decisions for
20 poll workers.

21 Those are just two very basic scenarios
22 where, you know, the election law is there, or
23 isn't there, and I point somebody to it and say,
24 you've got to go to a Superior Court judge if you
25 want something done about this.

1 Q. All right. Well, let's take a different
2 situation where the scenario is that somebody comes
3 to you with an issue that suggests a violation --

4 A. Uh-huh.

5 Q. -- of the state election --

6 A. Okay.

7 Q. -- laws. What is the Secretary of State's
8 responsibility, if any, to enforce those state
9 election laws?

10 A. Well --

11 MR. BELINFANTE: Object to the form.

12 You can answer.

13 THE WITNESS: It depends a lot on
14 what the violation is. If it's something
15 that a -- let me think about -- can you
16 give me an example of a complaint that
17 you --

18 BY MS. TANIS:

19 Q. Sure. You get a complaint from a voter
20 where the voter says, I timely requested an
21 absentee ballot and I never received one.

22 A. Okay. In that case, we would general --
23 depending on the circumstances, if it's -- if they
24 were to call us with that, say, four days before
25 the election, the first thing we would do would be

1 to contact the county and see if we could figure
2 out what, if anything, happened.

3 Maybe something got lost in the mail.

4 Maybe something is stuck on somebody's desk. Maybe
5 they can take some action to get this person what
6 they're entitled to.

7 If it's after the election, we would
8 generally send it to our investigative division,
9 who would investigate to determine whether or not
10 the County acted properly within the law, if they
11 met their legal requirements to make sure that they
12 properly processed and handled absentee ballot
13 applications and absentee ballots.

14 And then we would take whatever the result
15 of that investigation was to the State Election
16 Board, and the State Election Board would make a
17 determination as to whether or not there was a
18 violation and what the proper sanctions would be.

19 Q. You talked before about how the state
20 election code assigns certain tasks to the counties
21 and assigns certain tasks at -- to the state -- at
22 the state level --

23 A. Uh-huh.

24 Q. -- to the Secretary of State's office;
25 correct? Is that a fair --

1 differently, even though counties -- you know, this
2 county says we're not going to do that because we
3 don't have that many absentee ballots, it doesn't
4 take us very long.

5 Whereas, if Fulton County or Cobb County
6 or DeKalb County didn't take advantage of that
7 system, it would take them hours and hours and
8 hours longer to get results. Those are different
9 practices that are based on the specific needs of
10 the county and their resources.

11 Q. Right. And the -- and that practice,
12 though, that you're talking about doesn't really
13 affect the voter one way or the other, right, the
14 voter has already come in and cast a ballot?

15 A. Right. And so I would -- as I think I
16 said, the actual voting practice, there's really
17 not much room for creativity. There's really not
18 much variation. And that's that uniformity that
19 I'm talking about where you do provide that
20 protection.

21 Q. During early voting or on Election Day,
22 does the Secretary of State have personnel, you
23 know, on the ground checking whether polling places
24 are following the election laws?

25 A. We do.

1 the second page of that exhibit. There's an E-mail
2 from Jansen Head?

3 A. Okay.

4 Q. And she said -- she said -- and you got
5 this E-mail; correct?

6 A. If I'm in the list, I'm sure I did, yes.

7 Q. And it says:

8 "Dear board members, attached is
9 the Official Election Bulletin that
10 Chris Harvey distributed to the county
11 election officials today..."

12 It says -- and then it goes on to say:

13 "The same has also been posted to
14 Firefly and on the Secretary of State
15 Web site as a press release."

16 Was it common for O.E.B.s to be issued as
17 press releases?

18 A. I don't think so, no.

19 Q. Okay. Why was this particular O.E.B.
20 issued as a press release?

21 A. I don't know.

22 Q. Okay. Did you talk to Mr. Worley or
23 communicate with him otherwise about his E-mail
24 after he sent it?

25 A. He called me -- I believe the answer is

1 no. He called me that evening and was unhappy, as
2 we discussed. And I believe, looking at the
3 timing, the E-mail was sent at 7:18, so I believe
4 the E-mail was sent after he had called me.

5 Q. Okay.

6 A. Now, whether we ever spoke about it again,
7 I don't know. I don't recall anything, but. I
8 think that kind of ended this topic --

9 Q. Okay.

10 A. -- as far as he and I were concerned.

11 (Whereupon, a discussion ensued
12 off the record.)

13 (Whereupon, Plaintiff's
14 Exhibit 14 was previously
15 marked for identification.)

16 BY MS. TANIS:

17 Q. I'm handing you what we've marked
18 previously as Exhibit 14. And this is an E-mail
19 that Mr. Worley sent on November 13th, 2018;
20 correct?

21 A. Yes, ma'am.

22 Q. You received this E-mail?

23 A. I'm sure I did.

24 Q. And in this E-mail, Mr. Worley reports
25 that U.S. District Court Judge May issued an order

1 you and I pronounce her name, her last name
2 differently. So pronounce --

3 A. Frechette?

4 Q. No, no, no. Jordan?

5 A. Fuchs.

6 Q. Fuchs.

7 A. Fuchs.

8 Q. So she pronounces it Fuchs?

9 A. Yeah, Fuchs.

10 Q. All right. So --

11 A. Okay.

12 Q. -- let me try to phrase a question that's
13 more --

14 A. Okay.

15 Q. -- limited and comprehensible, and that's
16 whether you've discussed with Secretary
17 Raffensperger or Jordan Fuchs what the Secretary of
18 State's responsibilities are with respect to
19 training.

20 A. We have.

21 Q. Okay. And what have those conversations
22 been?

23 A. It has been that it's our -- it's the
24 Secretary of State's responsibility to train the
25 counties, which is usually the county election

1 director or board. And then it is the counties'
2 responsibility to train their poll workers and
3 their staff. So it's a "train the trainer"
4 scenario.

5 And that's the same understanding that was
6 the place with Secretary Kemp.

7 Q. And is it your impression that Secretary
8 Raffensperger and Ms. Fuchs agree with that?

9 A. Yes.

10 Q. The Secretary of State's office provides
11 training for county superintendents and registrars;
12 correct?

13 A. Yes.

14 Q. And that's the training that they take to
15 get certified?

16 A. Yes.

17 Q. The Secretary of State provides a series
18 of courses in connection with that; correct?

19 A. Yes.

20 Q. Okay.

21 (Whereupon, Plaintiff's
22 Exhibit 50 was marked for
23 identification.)

24 BY MS. TANIS:

25 Q. I'm handing you what I've marked as

1 counties'.

2 Q. All right. But you provide, for example,
3 poll workers manual and you --

4 A. Some videos.

5 Q. -- and videos, et cetera?

6 A. Yes.

7 Q. And you're aware that the counties can use
8 those materials directly; correct?

9 A. Yes, ma'am.

10 Q. And in fact, the Secretary of State's
11 office has repeatedly encouraged the counties to
12 use the training materials the Secretary of State's
13 office has prepared; right?

14 A. Yes.

15 Q. But the Secretary of State's office
16 doesn't require the counties to use the poll worker
17 training materials that the Secretary of State has
18 prepared; is that correct?

19 A. I believe that's correct.

20 Q. Why doesn't the Secretary of State's
21 office require that?

22 A. Well, because it's the responsibility of
23 the counties to train their poll workers. So we
24 make it available. And frankly, I think most of
25 the counties do use the materials.

1 I'm not aware of any county that doesn't
2 use -- and again, I can't speak for all 159
3 counties, but I don't believe I've ever had a
4 conversation or a discussion with somebody where
5 they said, we refuse to use your materials.

6 Q. Well, I'm not -- I mean, having a
7 conversation that says I refuse to use your
8 materials is a little bit different from you
9 knowing what materials the counties are using;
10 correct?

11 A. Yes.

12 Q. Okay. And in fact, I think you testified
13 before, you don't know what the counties are using,
14 you're not required to look at those materials, you
15 don't look at those materials; right?

16 A. Right.

17 Q. But let me go back to the question, do
18 you -- of why doesn't the Secretary of State
19 require its training materials to be used in the
20 training of poll workers?

21 A. I just, I don't think it's -- I don't know
22 that it would be helpful. I'm not sure that we
23 have the authority to require specific materials
24 outside of what is required.

25 Q. Do you know -- you know the state election

1 Q. Okay?

2 Did you ever talk to or otherwise
3 communicate with Secretary Kemp about what the
4 intent behind the "exact match" policy was?

5 A. I don't believe so.

6 Q. Have you ever communicated with anybody
7 else in the Secretary of State's office about what
8 the intent of the "exact match" policy was?

9 A. I know we discussed the exact match a
10 couple times, I think, due to pending litigation.
11 And so we were talking about -- I spoke with Ryan
12 Germany and Kevin Rayburn in our office about the
13 process and about amending the process through
14 legislation, I think in 2018, where we changed and
15 we extended the time frame and we made some
16 changes.

17 I don't know that we ever talked beyond
18 the idea of the goal of "match" was to verify voter
19 accuracy.

20 Q. Okay. Now, if a voter registration
21 application isn't complete when it's submitted, is
22 the registrar supposed to or required to obtain the
23 omitted information before sending that
24 registration application or before inputting the
25 information into E-net where it goes into the whole

1 A. I'm not aware of any.

2 Q. And when you testified a minute ago about
3 discussions about the desirability of having plenty
4 of polling places and concerns about closing of
5 polling places that might cause problems, have
6 those discussions at least included a discussion
7 about the potential impact of those changes on
8 voters of color?

9 A. I don't know that it's been specifically
10 addressed "voters of color." I think it generally
11 has to do more with accessibility and geography,
12 especially if you're talking about rural counties
13 that don't have mass transit and things like that.
14 In some cases those will be voters of color, in
15 some cases they won't.

16 Most of the conversations that I recall
17 have been focused around the impact it would have
18 on people in that county, regardless of race.

19 Q. Okay. When have those conversations or
20 discussions occurred?

21 A. You know, the issue was -- it sort of came
22 to a head last -- in the late summer, I think, of
23 2018 in Randolph County when Randolph County was
24 going to close some polling places. I sent them a
25 strong letter urging them to reconsider that

1 option, which they eventually did and didn't close
2 the polling places.

3 And it's come up as we've been discussing,
4 you know, the huge turn-out in 2018, which was
5 fantastic, but realizing that voter participation,
6 registrations through the roof, participations
7 through the roof, the counties need to be ready for
8 a lot of voters. And you need a lot of real
9 estate. You need devices. You need places. You
10 need all that stuff.

11 So we've actively been encouraging
12 counties to strongly consider expanding polling
13 places and have cautioned them, frankly, when it's
14 been brought to my attention, cautioned them and
15 have -- asked them to take a second look if they
16 were considering closing or consolidating polling
17 places.

18 Q. And how has the Secretary of State's
19 office gone about encouraging counties to expand
20 the number of polling places?

21 A. A lot of it has had to do with discussions
22 around the new voting equipment and some of the
23 changes that that's going to necessitate. And so
24 in conference call -- I have a weekly conference
25 call with the whole state. It's actually divided

1 But I can't answer why they did this in
2 this document.

3 Q. All right. You've been consulted several
4 times by voters or election officials about
5 potential polling place closures; correct?

6 A. Yes.

7 Q. And your response has typically been it's
8 a -- this is a county decision and the Secretary of
9 State's office doesn't have authority to intervene?

10 A. I do tell them ultimately it's their call.
11 But what I tell them is that I would hope that they
12 would be very, first of all, be very skeptical,
13 that they need to be very data driven, they need to
14 do their homework and find out the statistics, the
15 X's and O's, how many people are -- how many people
16 vote during advance voting, how many people vote on
17 Election Day, all that data, and then make a case,
18 have public -- I say make it as public as -- I
19 encourage them to make it as public as possible,
20 get people involved early, don't drop it on people
21 at the last minute, and to realize that, one, you
22 know, it's going to be viewed very, very critically
23 in today's climate, that they're going to get a lot
24 of questions about it, and that, you know, given
25 the what we're going to with the new voting system,

1 there's probably going to be a need -- and the
2 turn-out, there's going to be a need for more
3 polling places. So.

4 But I do say that it's their call. And I
5 believe that it's their call. But I, frankly, try
6 to throw up as many speed bumps as possible so that
7 if, at the very least, if they make that
8 determination, because I do believe they ultimately
9 know, you know, what their situation is better than
10 I do anyway, that they are well-prepared with data
11 that's going to support any decision they make.

12 Q. And on what basis do you say that the
13 Secretary of State's office doesn't have the
14 authority to intervene in these decisions?

15 A. Well, because the law specifically gives
16 to -- authority to the county election
17 superintendent.

18 Q. If the Secretary of State's office saw
19 that there would be a disparate impact on voters of
20 color with polling place closures and an actual or
21 potential violation of the Voting Rights Act, do
22 you think the Secretary of State's would have --
23 State's office would have no authority to intervene
24 on that?

25 MR. BELINFANTE: Object to the form.

1 Q. When was the first time -- I mean, when
2 you say you've been -- you generally encourage
3 counties to keep polling places open or to add
4 polling places, when did you first start doing
5 that?

6 A. It was probably, frankly, around the time
7 of the Randolph County --

8 Q. Okay.

9 A. -- issue. I mean, it's always been our
10 position that it's ultimately the County's call,
11 but. And then seeing, again, seeing the turn-out
12 and realizing what -- you know, the turn-out
13 increases that are -- you know, we expected it to
14 increase this year over last year, they're just
15 going to need more space.

16 Q. Now, with respect to the Randolph County
17 situation in the summer of 2018, Secretary Kemp
18 came out with a public statement saying that the
19 Secretary of State's office had strongly urged
20 local election officials to abandon their effort to
21 close polling places; correct?

22 A. That sounds familiar.

23 Q. So there was certainly as many impediments
24 to the Secretary of State's office strongly urging
25 a county not to close polling places; right?

1 situation?

2 A. I think he was -- I'm not sure if I'd use
3 the word "upset." I think he was concerned that it
4 seemed to be very fast, not well-planned perhaps,
5 and that it was not well-timed.

6 Q. When you say it wasn't well-timed, what do
7 you mean?

8 A. Well, it's, you know, getting into the
9 election season, you know, which starts earlier and
10 earlier every year, like other seasons tend to.

11 Q. But it was within the statutory --

12 A. It was.

13 Q. -- within the --

14 A. Yes.

15 Q. -- acceptable statutory time frame;
16 correct?

17 A. It was.

18 Q. So --

19 A. And it was also ultimately their decision
20 to make, as we pointed out in the letter.

21 Q. Did Secretary Kemp ask you to send a
22 letter to Mr. Peavy?

23 A. I believe so.

24 Q. Did you write this letter or did somebody
25 else in the Secretary of State's office write it?

1 And to the extent there has been, then I
2 would instruct you not to answer.

3 THE WITNESS: I'm trying to think. I
4 don't recall a lot of specific
5 conversations.

6 I know, for example, and this
7 doesn't -- isn't affected by what
8 Mr. Belinfante said, the -- I remember
9 them asking about the provisional ballots.
10 Because the complaint says that the state
11 provides provisional ballots to the
12 counties, and that's not correct.

13 And so I think they asked about that,
14 and I clarified that we don't provide
15 provisional ballots to the county. So it
16 may have been things like that.

17 BY MS. TANIS:

18 Q. Are those the only questions that you've
19 gotten from Secretary Raffensperger or Jordan Fuchs
20 about the allegations in the complaint?

21 MR. BELINFANTE: Again, I would
22 object to the extent that, if the
23 questions arise in a meeting where counsel
24 is present, then I would instruct him not
25 to answer that.

1 line for significantly longer periods of time than
2 people who don't?

3 A. I --

4 MR. BELINFANTE: Object to the form.

5 THE WITNESS: No, I don't think they
6 should.

7 BY MS. TANIS:

8 Q. That's not treating people in different
9 counties uniformly, is it?

10 A. That's correct. I think in my
11 recollection, in several of the cases there were
12 mistakes that were made by local election
13 officials.

14 I know in Fulton County that there was a
15 park where they just mistakenly sent too few voting
16 machines. And the election director acknowledged
17 he, I think he read a spreadsheet wrong and he put
18 the wrong number to be delivered.

19 And Gwinnett County had an issue with some
20 power cords that were left or not packed in with
21 the stuff, and that resulted in long lines. But I
22 agree with your point that you shouldn't be
23 penalized by long lines regardless of where you
24 live.

25 Q. Other than what you've already testified

1 (Whereupon, the document was
2 reviewed by the witness.)

3 THE WITNESS: Okay. Yes, I'm up
4 there. I'm with you.

5 BY MS. TANIS:

6 Q. Okay. And in neither of these situations,
7 if those facts are accurate, in neither of those
8 situations were voters treated the way that they
9 should be treated; correct?

10 MR. BELINFANTE: Object to form.

11 THE WITNESS: Yeah, I'm -- in the
12 first case, yes, clearly, Mr. Martin.
13 With the second case, I'm trying to figure
14 out. So she...

15 (Whereupon, the document was
16 reviewed by the witness.)

17 THE WITNESS: My advice to counties
18 is they should not tell people a
19 provisional ballot will or will not count.
20 Because the poll worker doesn't know
21 whether or not it will count.

22 It could be that the -- her -- like
23 in the case I mentioned before, this woman
24 may have been accidentally transferred to
25 a different county, and when they

1 researched it they may have found out that
2 it would count.

3 So I tell -- I direct county election
4 officials not to have, I don't think it's
5 a good idea to have poll workers
6 preordaining the acceptance or rejection
7 of a provisional ballot.

8 BY MS. TANIS:

9 Q. Okay.

10 A. But I -- but yes, I think that that's not
11 the way it should have been handled.

12 Q. All right. So what happened in response
13 to this information?

14 Or let me state that differently. What
15 did you do in response to getting this information,
16 which does provide the contact information and the
17 names of the voters?

18 A. I believe I spoke with Ms. McGowan. I'm
19 not 100 percent positive. But I spoke with a woman
20 in this similar circumstance who voted a
21 provisional ballot or went somewhere and voted a
22 provisional ballot and then found out that, based
23 on what she heard from me, she should have stayed
24 where she was and voted there instead of going back
25 to where they told her to go. I can't swear that

1 assume you don't recall what you told her?

2 A. Assuming I had the conversation, because
3 I'm sure I would have called her back on a request
4 from Ms. Fuchs, it would have been essentially what
5 I've said here about Cross-Check.

6 But I honestly don't -- it could have been
7 that Ms. Johnston forwarded me to a legislator or
8 somebody else, so I really don't know. I just
9 don't recall having that conversation.

10 Q. Okay. And when you said it would have
11 essentially been what I've said about Cross-Check,
12 what has that been?

13 A. Is that we didn't take action based on
14 information that was in Cross-Check.

15 Q. And did you tell Ms. Fuchs that as well?

16 A. I've told her that before. I don't know
17 if I told her that in conjunction with this phone
18 call, although that would have been a good
19 opportunity.

20 Q. All right. I'm going to switch topics
21 here. Do you know how many B.M.D. machines have
22 been bought or will be bought?

23 A. I think it's about 33,000.

24 Q. Okay. And do you know how many check-in
25 machines have been bought or will be bought?

1 A. I don't have that number. I know we have
2 that number. I'm just not -- I don't have that in
3 my memory.

4 Q. And do you know whether these machines,
5 both kinds of machines, will be distributed
6 according to population numbers?

7 A. That's one of the calculations.

8 Q. And what are the other calculations?

9 A. Number of polling places. And as much as
10 possible, similar distribution to what counties
11 already have. Our goal is -- our basic goal is to
12 not have any county decrease in ability to conduct
13 voting.

14 Now, one of the features of the B.M.D.s
15 that's different from the D.R.E.s is that they can
16 be used in advance voting and on Election Day. So
17 previously, once you use a D.R.E. in advance
18 voting, even if there are no votes cast on it, it
19 was done. You couldn't use it on Election Day.

20 Now if a county deploys 40 B.M.D.s, they
21 could practically deploy all their B.M.D.s for
22 advance voting and then turn around and use all
23 those same B.M.D.s on Election Day. So you almost
24 get twice the utility out of a B.M.D. for advance
25 and Election Day.

1 So the general calculation that was done
2 by other folks in our office was to try to match,
3 and certainly not decrease any ability for counties
4 to conduct elections, reflect changes, increases
5 where number of voters had gone up, possibly
6 reflect decreases in population, and -- and I think
7 that's basically it.

8 Q. Okay.

9 MS. TANIS: If you'll let us take a
10 quick break, I may be --

11 MR. BELINFANTE: Sure.

12 MS. TANIS: -- done here.

13 THE VIDEOGRAPHER: Going off the
14 record at 6:14.

15 (Whereupon, a discussion ensued
16 off the record.)

17 (Whereupon, there was a brief
18 recess.)

19 THE VIDEOGRAPHER: We're back on the
20 record at 6:21.

21 MS. TANIS: Mr. Harvey, I don't have
22 any questions for you right now.

23 I will just state for the record, we
24 still don't have a lot of documents,
25 including voter complaints. So I reserve



The Office of Secretary of State

Brian P. Kemp
SECRETARY OF STATE

2 Martin Luther King Jr. Drive
802 West Tower
Atlanta, Georgia 30334

Chris Harvey
ELECTIONS DIRECTOR

August 23, 2018

Via Electronic Mail

Mr. J. Scott Peavy
Randolph County Board of Elections and Registration
93 Front Street
Cuthbert, Georgia 39840
jscottpeavy@live.com

Re: Polling Place Closures

Dear Chairman Peavy,

This morning, you called me regarding the ongoing situation in Randolph County. Given the sheer volume of unsubstantiated claims made by your office and its consultant, Mike Malone, I am sending you this letter to make our position clear.

We do not support the proposed consolidation. With one day before the Board's vote on Mr. Malone's consolidation proposal, it is troubling that you are contacting our office.

You spoke with me this morning about firing Mr. Malone. Contracting his services was completely up to you, your fellow board member, and your county commission. You know that, and Mr. Malone knew that. Clearly, Mr. Malone did not provide sound advice with this proposal. I did not recommend it, I do not endorse it, and I think you should abandon it. How your board reconciles employment contracts with individuals and how different governmental entities within Randolph County address these matters are solely the business of Randolph County.

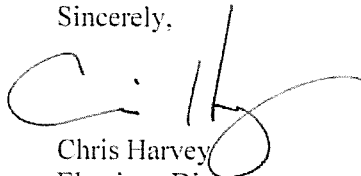
You mentioned opening temporary polling places which are ADA-compliant. As I told you this morning, Georgia law puts decisions about local polling places squarely on your shoulders. The law reads the same for you as it does for every other county in the state. You should work with your county attorney, local elected officials, and voters to determine how best to serve the interest of local voters. I have no authority to allow or restrict anything that is specified in law or rules; however, I do strongly encourage you to find a timely and reasonable solution to any issues that might adversely impact voters in Randolph County.

In closing, I want to reiterate my opposition to the consolidation plan before you. I also want to underscore my frustration with the inaccurate statements about our office's role throughout this entire process.

You have created a national media spectacle by seeking to make major changes right before an election and failing to act in a decisive manner that is responsive to the demands of voters in Randolph County.

Please follow the law, do the right thing, and work incredibly fast to right the ship in Randolph County.

Sincerely,



Chris Harvey
Elections Director

cc: Tommy Coleman, Esq., Randolph County
tcoleman@perrywalters.com